

## Instructions for Rottneros' whistleblower service

As Decided by Rottneros' CEO 2025-06-12  
Also published on Rottneros' external website



## Internal and external communication

These instructions are published both internally on RotNet and externally on Rottneros' website, so that everyone involved can easily access them.

## Rottneros whistleblower service

### We want to do the right thing

Rottneros strives to maintain an open business climate and a high standard of business ethics. We care about safety and respect for all people involved in our activities. You have an important role to play in our success.

### Our whistleblower service

The whistle-blower service gives everyone, internally and externally, the opportunity to report a suspicion of serious misconduct. Our whistleblower service is an early warning system to reduce risk. It is important to safeguard good corporate governance and maintain confidence in us among all stakeholders and among the public.

We encourage you to first contact your manager or another manager, or your contact person if you are an external party. If you feel that you cannot be open with your information, we offer the opportunity to report your concern anonymously.

The service is available around the clock via the website and reporting can be done in the way that suits you best.

### Protection for whistleblowers

It is important to us that you feel safe. Your anonymity is guaranteed and therefore you do not risk any form of punishment, reprisals or negative consequences. The protection applies regardless of whether it later turns out that the information cannot be substantiated.

### When can I use the whistleblower service?

The whistleblower service can be used to provide information about a concern regarding something that is not in line with our values and ethical principles or with the laws and regulations that apply to our business, and that could seriously affect the life or health of a person or our organisation.

You do not need to have proof of your suspicions, but all communication must be made in good faith.

### Where to submit your message

To ensure your anonymity, the service is managed by an external party WhistleB, the Whistleblowing Centre, <https://report.whistleb.com/rotnneros>

The communication channel is encrypted and password protected. All messages are treated confidentially and anonymously.





### Handling of case

Whistletructioblowing cases are forwarded to two individuals, who are appointed by the CEO. They are the CFO and the HR Director ("Case Managers").

Cases must be addressed without delay and reported to the CEO. In cases concerning the CEO, the Chairman of the Board shall be informed.

The Case Managers will decide whether it is appropriate for them to investigate the case, or if someone else needs to join the group.

If a case concerns one of the appointed individuals, she/he shall promptly notify the CEO, who shall appoint a replacement to handle the case.

Feedback to the individual who reported the matter is provided via WhistleB, Whistleblowing Centre.

The number of incoming cases is reported to the Audit Committee on a quarterly basis. If the need arises and the privacy of all parties can be ensured, reporting can be more detailed.

